

EXHIBIT 14

FILED UNDER SEAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

-oOo-

WAYMO LLC,)

)

Plaintiff ,)

)

vs.) Case No: 3:17-cv-00939-WHA

)

UBER TECHNOLOGIES, INC.,)

OTTOMOTTO LLC, OTTO TRUCKING,)

LLC,)

)

Defendants.)

)

CONFIDENTIAL - ATTORNEYS' EYES ONLY
VIDEOTAPED DEPOSITION OF DANIEL GRUVER
San Francisco, California
Thursday, April 20, 2017

Reported by:

LISA R. TOW

CSR No. 6629

Job No. 2599857

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1 Q. Are you aware whether GBR2 used a 10:21:08AM
2 similar design? 10:21:13AM
3 A. I don't recall. 10:21:14AM
4 Q. Are you aware of any other lidar 10:21:15AM
5 devices that use [REDACTED]? 10:21:16AM
6 A. I am. 10:21:17AM
7 Q. What are they? 10:21:18AM
8 A. Velodyne. 10:21:19AM
9 Q. And what do they use [REDACTED] 10:21:22AM
10 [REDACTED]? 10:21:25AM
11 A. I don't know. 10:21:26AM
12 Q. What is the context in which 10:21:26AM
13 Velodyne uses [REDACTED]? 10:21:30AM
14 A. The edge of the diode [REDACTED] 10:21:33AM
15 [REDACTED] 10:21:36AM
16 Q. For what type of PCB? 10:21:38AM
17 A. Sorry. Clarify. 10:21:42AM
18 Q. Well, like in what context is the 10:21:44AM
19 PCB used that you're referring to? 10:21:47AM
20 A. The PCB holds a laser and other 10:21:50AM
21 electronics. 10:21:54AM
22 Q. And what is the version of 10:21:55AM
23 Velodyne that has that feature? 10:21:59AM
24 A. I don't know about their 10:22:01AM
25 exhaustive catalog of lidar, but they're VLP 10:22:06AM

1 model, I believe. 10:22:11AM

2 Q. And that's one that you've 10:22:12AM

3 observed in connection with your work at 10:22:15AM

4 Otto or Uber? 10:22:19AM

5 A. Yes. 10:22:22AM

6 Q. Is the [REDACTED] on the Fuji -- for 10:22:22AM

7 the PCBs and Fuji that do have [REDACTED] 10:22:33AM

8 [REDACTED]? 10:22:38AM

9 A. I don't know. 10:22:40AM

10 Q. Are you aware of any patents or 10:22:41AM

11 publications that disclose [REDACTED] 10:22:47AM

12 [REDACTED]? 10:22:49AM

13 A. I'm not. 10:22:50AM

14 Q. The Fuji design includes [REDACTED] 10:22:50AM

15 transmit boards total; is that fair? 10:22:55AM

16 A. That is. 10:22:58AM

17 Q. And each of the [REDACTED] transmit PCBs 10:22:59AM

18 in the Fuji device includes [REDACTED] 10:23:02AM

19 laser diodes; is that correct? 10:23:05AM

20 A. That is correct. 10:23:07AM

21 Q. What's the benefit of that design? 10:23:08AM

22 A. Of which design? 10:23:10AM

23 Q. Of the -- of having [REDACTED] transmit 10:23:13AM

24 PCBs that include [REDACTED] laser 10:23:18AM

25 diodes? 10:23:22AM